

PIERCE BAINBRIDGE BECK PRICE & HECHT^{LLP}

October 18, 2018

Via ECF and U.S. Mail

Hon. Paul A. Crotty
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Chambers 1350
New York, NY 10007

Re: *Adler v. Payward, Inc., d/b/a Kraken*, No. 18-cv-08100 (PAC)

Dear Judge Crotty:

I represent Defendant Payward, Inc. d/b/a Kraken (“Kraken”) in the above-captioned matter. Through inadvertent confusion regarding its acceptance of service, Kraken was operating under the impression that it had more time to respond to the complaint. I have spoken with counsel for plaintiff Robert C. Adler, copied on this communication, and he has agreed to stipulate to a two-week extension for Payward to answer, move or otherwise respond to the complaint. We have attached for your consideration a stipulation and proposed order, signed by counsel for both parties, reflecting this agreement. We respectfully request that Your Honor So Order the stipulation.

Sincerely,



Christopher N. LaVigne
Pierce Bainbridge Beck Price & Hecht LLP
20 West 23rd Street, Fifth Floor
New York, NY 10010

Encl.: Stipulation and [Proposed] Order

cc: Roger Marion, Esq. (via ECF)